

**MEMORANDUM OF UNDERSTANDING REGARDING SETTLEMENT
OF ALL CLAIMS IN:**

*John T. Sanders vs. Cuyahoga County, Armond Budish, David G. Schilling, Jr., Shane Alex
Pellom, Bruce Lourie, Joan Rodriguez, Jr.
United States District Court, Northern District of Ohio
Case No.: 1:21-cv-1254*

As a result of the mediation conducted on July 5, 2023, this case is settled on the following terms:

- Cuyahoga County will pay John T. Sanders the total sum of [REDACTED] [REDACTED]. This will be paid within a reasonable amount of time following receipt of a fully executed release and W-9 and following appropriate approvals by County Council. The settlement check(s) shall be made payable as reasonably directed by Plaintiff's counsel.
- Counsel for the County shall prepare a draft of the Settlement Agreement and shall forward it to counsel for the Plaintiff within the next week or so. The W-9 shall be provided to counsel for the County as soon as possible.
- The Settlement Agreement will include broad, general releases of all claims against all Defendants including claims for attorneys' fees.
- Any litigation between the parties will be dismissed, with prejudice, each side to bear its own attorneys' fees, costs and expenses. The County agrees to pay all mediation costs.

This outline sets forth the basic terms of the parties' settlement, to be memorialized in a more definitive Settlement Agreement to be drafted pursuant to paragraph 2 above. County agrees to present the final Settlement Agreement, containing the terms and commitments set forth herein, to County Council with the Prosecutor's Office recommendation that it be approved.

Dated: July 6, 2023